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UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF CALIFORNIA

RAUL AGUILAR, ADAN INFANTE, EDGAR	)	Case No. C07-00272 JL
MARTINEZ, DAVID ORTEGA,	)	
CUAUHTEMOC PALMA, HUGO PARDO,	)	<b>CASE MANAGEMENT</b>
MARCO PARDO, ISMAEL PARRA,	)	<b>STATEMENT AND <del>PROPOSED</del></b>
EDUARDO PEREZ, ROSALIO PEREZ,	)	<b>ORDER</b>
MIGUEL RIOS, and DOES 1-10, inclusive,	)	
	)	
Plaintiffs,	)	
	)	CMC Date: October 17, 2007
vs.	)	Time: 10:00 A.m.
	)	Courtroom: F, 15 <sup>th</sup> Floor
RUMI CONSTRUCTION, a sole proprietorship	)	
of HAMID GHAZANFARI; AMANA	)	
ENGINEERING & CONSTRUCTION, INC.;	)	Judge: Honorable James Larson
AMERICAN CONTRACTORS INDEMNITY	)	
CO.; OAKLAND UNIFIED SCHOOL	)	
DISTRICT, and DOES 1-10, inclusive,	)	
	)	<b>DEMAND FOR JURY TRIAL</b>
Defendants.	)	
	)	

Plaintiffs and defendants Amana and Oakland Unified School District<sup>1</sup> submit the following Joint Case Management Conference Statement, requesting that the Case Management

<sup>1</sup> Defendant Ghazanfari, dba Rumi, has filed a petition for Chapter 13 Bankruptcy and is not participating in this action. Defendant American Contractors has not responded to Plaintiffs' request that it join this Statement and proposed Order. Plaintiffs have no reason to believe that American Contractors opposes the other parties' request to reschedule the Case Management Conference.

Plaintiffs and defendant Amana Engineering and Construction, Inc. have reached agreement on a dollar figure which will settle all claims in this case. Significant procedural issues remain to be worked out, and the parties are presently working on a settlement agreement which, if successful, all parties will execute. Pursuant to this tentative agreement, the parties have agreed to suspend all discovery and pleading obligations, including defendants' obligation to respond to Plaintiffs' Second Amended Complaint, and to respond to Plaintiffs' Motion for an Order enjoining "summary proceedings" under California Labor Code Section 3201, currently scheduled for hearing on October 25, 2007. Plaintiffs have also agreed to take this Motion off calendar and hereby respectfully request the Court to do so.

Accordingly, all parties participating in this matter jointly request the Court to reschedule a Case Management Conference, for October 24, 2007, with the hope and expectation that this Conference can be taken off calendar due to the filing before that time of a Settlement Agreement providing for a dismissal of all claims, counterclaims and interpleader motion.

DATED:       /s/        
Philip C. Monrad  
Counsel for Plaintiffs

DATED:       /s/        
          Mahmoud Abouzeid, Jr.  
          Counsel for Defendant AMANA  
          Engineering & Construction, Inc.

DATED: \_\_\_\_\_/s/\_\_\_\_\_  
Meredith Brown  
Counsel for Defendant  
Oakland Unified School District

PURSUANT TO STIPULATION, SO ORDERED. Further Case Management Conference scheduled for ~~October 24, 2007, 10:30 p.m.~~ November 7, 2007 at 10:30 a.m., Hearing on Motion Vacated.

DATED:.. October 11, 2007

Honorable James Larson  
U.S. Magistrate Judge